

PLAINTIFF'S  
EXHIBIT

**A**

**AFFIDAVIT CONCERNING COST AND NECESSITY OF SERVICES**

(Pursuant to Tex. Civ. Prac. & Rem. Code §§ 18.001 & 18.002 &  
*Haygood v. De Escabedo*, 356 S.W.3d 390 (Tex. 2011))

Billing Record - ROBLES, JORGE ALBERTO      DOB: 05/26/1974  
Memorial Hermann Northeast Hospital  
Request # 416760

Before me, the undersigned authority, personally Theresa Pappas, who, being by me duly sworn, deposed as follows:

My name is Theresa Pappas. I am over twenty-one years of age, of sound mind and capable of making this affidavit. I am personally acquainted with the facts herein stated.

I am the Custodian of Patient Billing Records at and for Memorial Hermann Northeast Hospital. Attached to this affidavit are copies of records that provide a statement of the charges and payments or account adjustments for the services that Memorial Hermann Northeast Hospital provided to the individual identified and for the dates specified. The attached records are part of this affidavit.

The attached records are kept by me in the regular course of business. The information contained in the records was transmitted to me in the regular course of business by employees of Memorial Hermann Northeast Hospital who had personal knowledge of the information. The records were made in the regular course of business at or near the time or reasonably soon after the time that the service was provided. The records are exact duplicates of the originals. It is a policy of Memorial Hermann Northeast Hospital to not release original records.

The service provided was necessary, and the amount charged for service was reasonable at the time and place that service was provided. For the services provided, the amount paid (\$ 0.00 ) and the amount still outstanding (\$ 6,802.00 ) add up to a total of \$ 6,802.00 , which is the amount this provider was/is legally entitled to recover."

Theresa Pappas  
AFFIANT

SWORN TO AND SUBSCRIBED before me the 9 day of August, 2018.

Tamara Livas  
Notary Public in and for the State of Texas

